

Ashley M. Simonsen (Bar No. 275203)
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, California 90067
Telephone: (424) 332-4800
Facsimile: (424) 332-4749
Email: asimonsen@cov.com

*Attorney for Defendants Meta Platforms, Inc.;
Meta Payments Inc.; Meta Platforms
Technologies, LLC; and Instagram, LLC*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF META
DEFENDANTS' MOTION TO EXCLUDE
GENERAL CAUSATION TESTIMONY OF
PLAINTIFFS' EXPERT DR. MITCH
PRINSTEIN**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 AM
Place: Courtroom 1, 4th Floor

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc.; Meta Payments Inc.; Meta Platforms Technologies, LLC; and Instagram, LLC

2. Meta Platforms, Inc. f/k/a Facebook, Inc.; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; and Instagram, LLC. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the May 16, 2025 MDL expert report of Mitch Prinstein.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the September 26, 2025 MDL deposition transcript of Mitch Prinstein.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Burnell et al., *The effects of social media restriction: Meta-analytic evidence from randomized controlled trials* (2025).

6. Attached hereto as **Exhibit 4** is a true and correct copy of American Psychological Association, *Health Advisory on Social Media Use in Adolescence* (2023).

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct. Executed on October 03, 2025, in Los Angeles, California.

DATED: October 3, 2025

By: /s/ Ashley M. Simonsen